

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SANDRA J. WHITE]
]
Plaintiff,]
]
vs]
]
DETECTIVE MARZEC,]
TOWN OF DELMAR,]
MARVIN MAILEY, AND]
CITY OF DOVER, AGENT]
TOM JACOBS, AGENT]
CHRIS QUAGLINO and]
DRUG ENFORCEMENT]
AGENCY]
]
Defendants,]



06-8 (KAJ)

AMENDED COMPLAINT

Now Comes the plaintiff, Sandra J. White, pro se, who so moves the Honorable Court, pursuant to Fed. Rule Civ. Pro. 15 and in support of the same the following is submitted:

(1). It is a common policy of towns [Town of Delmar] and cities [City of Dover] to allow certain officers to work undercover with DEA. but (a) these officers are still their employees (b) they still utilizes that Town or City's badge of authority and (c) while working DEA operations they use the 'badge of authority' of that Town or City, to obtain warrants, make arrests and file documents in Courts using that Town or City's Police Department as the Arresting Agency.

a. All this is done with 'full' knowledge , understanding and authorization of the same by that Town [Town of Delmar] and City [City of Dover] and they are wholly responsible for damages claimed By plaintiff this is more than a 'casual link' in this matter.

(2). Sandra White, has suffered greatly at the 'hands' of Det. Marzec and his fellow officers, and their actions has violationed her rights under 4th Amendment Illegal Search and Seizure as well transgression upon 14th Amendment rights of Due Process and Equal Protection of the Law.

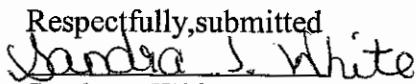
White vs Marzec, et al., C.A. 06-009-KAJ

a. She was handcuffed and gun pointed in her face, searched and seized, because of Marzec's 'poor training' and supervision and Officer Marvin Mailey was the main culprit of this violation, because He made initial contact with Ms White and created the abuse and the City of Dover, is responsible for his 'poor training and supervision' All that occurred on 08-21-05 could have been avoided.

b. First and foremost Marzec and Officer Marvin Mailey and their other fellow Officers should have never been Lincoln Delaware residence, because their search warrant was for a (a) single wide tan and white mobile home (b) the warrant authorized searches and seizure in Ellendale Delaware and © The Home in Lincoln, Delaware is a doublewide and Brown in color and such a home exist in Ellendale Delaware and many picture of it are in Court record. Pembaur v. Cincinnati, 475 U.S. 469

c. The Town of Delmar, has even allowed its Police Chief Hal Saylor to participate in these type of actions. (a) this is a 'show' of "deliberate type of conduct" and signifies they are a "moving force" in the actions of their suborned. Monell v. New York City Dept., of Social Servs 436 U.S. 658

The failure to train and supervise Marzec and Officer Marvin Mailey, falls directly upon the Town of Delmar and City of Dover as well as their fellow officer participating in the convert DEA action. (a). what Marzec and Officer Marvin Mailey and their fellow officers did on 09-21-05, violated the civil rights of Ms White and shows the 'deliberate indifference' to sustain this "cause of action" against the Town of Delmar and City of Dover, because if 'properly trained' Marzec and Officer Marvin Mailey, would have known policemen just don't search and seize at a location that (a) the search warrant doesn't authorize (b) don't search and seize a location that a judge hasn't authorized and (c). Know the difference from Lincoln and Ellendale after a three month investigation and not lie about it.
Canton v. Harris, 489 U.S. 378

Respectfully submitted

Sandra J. White
9008 Green Top Rd
Lincoln, DE. 19960

Dated July 11, 2006

CERTIFICATE OF SERVICE

I, Sandra J. White, verify service

Of the attached document, via U.S. Postal Service, on this 11th

Day of July 2006 with my signature I attest

The same.

Sandra J. White
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